

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SCOTT GILMORE, et al.,)	
)	
Plaintiffs,)	C.A. No. 20-1085-MN
)	
v.)	JURY TRIAL DEMANDED
)	
MONSANTO COMPANY,)	
)	
Defendant.)	

MOTION TO INTERVENE BY JASON RINEHART

Jason Rinehart seeks to intervene in this case for the limited purpose of addressing the proposed class action settlement (D.I. No. 24) ("Preliminary Approval Motion") and any related matters that may arise in connection therewith.

Mr. Rinehart is an absent class member as the settlement class is defined in the proposed class action settlement. He is also the named plaintiff in putative class action *Rinehart v. Monsanto Company*, 20SL-CC04939, pending in Missouri state court, which asserts medical monitoring claims on behalf of a class of individuals who have used and/or been exposed to Roundup and who, as a result, are at a significantly increased risk of developing numerous forms of cancer, including non-Hodgkin's lymphoma.

Mr. Rinehart seeks to intervene to protect his and other putative class members' rights to medical monitoring relief. Those medical monitoring claims would be released by the proposed class action settlement in this case, but the proposed settlement does not provide any consideration in exchange for that release. Mr. Rinehart's Opposition to the Preliminary Approval Motion was filed on June 28, 2021 (D.I. Nos. 37-38).

Intervention is proper under Federal Rule of Civil Procedure 24, as Mr. Rinehart explains in his accompanying memorandum.

Dated: July 26, 2021

Respectfully submitted,

MORRIS JAMES LLP

/s/ Sarah M. Ennis

Jeffrey R. Waxman (DE Bar No. 4159)

Sarah M. Ennis (DE Bar No. 5745)

500 Delaware Avenue, Suite 1500

Wilmington, DE 19801-1494

Telephone: (302) 888-6800

Facsimile: (302) 571-1750

jwaxman@morrisjames.com

sennis@morrisjames.com

Elizabeth A Fegan (admitted *pro hac vice*)

FEGAN SCOTT LLC

150 S. Wacker Dr., 24th Floor

Chicago, IL 60606

Telephone: 312.741.1019

beth@feganscott.com

Melissa Ryan Clark

FEGAN SCOTT LLC

140 Broadway, 46th Floor

New York, NY 10005

Telephone: 347.353.1150

melissa@feganscott.com

William Riley

RILEY WILLIAMS & PIATT, LLC

301 Massachusetts Ave.

Indianapolis, IN 46204

Telephone: 317.633.5270

wriley@rwp-law.com

J. Barton Goplerud

SHINDLER, ANDERSON, GOPLERUD &

WEESE, P.C.,

5015 Grand Ridge Drive, Suite 100

West Des Moines, Iowa 50265

Telephone: 515.223.4567

goplerud@sagwlaw.com

Counsel for Jason Rinehart